

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

MDL No. 2323
Case No. 12-md-2323 (AB)

Kevin Turner and Shawn Wooden,
on behalf of themselves and others
Similarly situated,

Civil Action No. 14-cv-0029

Plaintiffs,

vs.

National Football League and NFL
Properties LLC, successor-in-interest
to NFL Properties, Inc.

Defendants.

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**JOINDER TO THE RESPONSE OF THE LOCKS LAW FIRM TO THE EXPERT
REPORT OF PROFESSOR WILLIAM B. RUBENSTEIN**

Zimmerman Reed LLP joins the January 3, 2018, Response of the Locks Law Firm to the Expert Report of Professor William B. Rubenstein [ECF No. 9545]. In particular, Zimmerman Reed joins Locks Law Firm in respectfully requesting that its 20% contingency fee agreements be honored for former players who retained Zimmerman Reed prior to preliminary approval of the Settlement and for whom Zimmerman Reed sought a diagnosis through an independent medical analysis. On March 4, 2016, Zimmerman Reed voluntarily reduced its contingency fee to 20% for all NFL Concussion clients. During that time, Zimmerman Reed expended

significant resources to determine whether clients were suffering from a Qualifying Diagnosis, including some who may never have a compensable diagnosis. These efforts included covering the costs of neuropsychometric testing and neurological consultations, retaining a board-certified neurosurgeon to interview former players and review their medical records, and obtaining and reviewing full medical histories, among other expenses. For these high-risk, resource-intensive clients, Zimmerman Reed requests the Court honor Zimmerman Reed's 20% contingency fee agreements for all of the reasons set forth in the Locks Law Firm Response.

Respectfully submitted,

ZIMMERMAN REED LLP

Dated: January 3, 2018

s/ Charles S. Zimmerman

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